



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

December 9, 2021

By ECF

The Honorable Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Project South et al. v. U.S. Immigration and Customs Enforcement et al.*, 21 Civ. 8440 (ALC) (BCM)

Dear Judge Moses:

This Office represents U.S. Immigration and Customs Enforcement, the U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, the U.S. Department of Justice Executive Office for Immigration Review, and the U.S. Department of State (collectively, the "Government"), the defendants in the above-referenced case filed under the Freedom of Information Act, 5 U.S.C. §§ 552 *et seq.* I write respectfully to request an adjournment of the initial conference currently scheduled for January 4, 2022, at 11:00 a.m.

I will be departing the U.S. Attorney's Office next week, and the second Assistant U.S. Attorney assigned to this case is out on parental leave until early January. Accordingly, we respectfully request a 30-day adjournment of the initial conference, from January 4, 2022, to February 3, 2022, or to any day thereafter convenient for the Court. Plaintiffs consent to this request.

We thank the Court for its consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of Record
By ECF